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March 10, 2021

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)*

Dear Judge Kaplan:

This letter motion relates to all cases. On behalf of Plaintiff Skatteforvaltningen (“SKAT”), the Customs and Tax Administration of the Kingdom of Denmark, we write to request leave to file under seal certain exhibits that were submitted to the Court in connection with our Motions for the Issuance of a Request for International Judicial Assistance to Obtain Evidence in the British Virgin Islands and the Cayman Islands (Letters Rogatory) (the “BVI Motion,” No. 18-md-2865 (LAK), ECF Nos. 327-329; the “Cayman Motion,” No. 18-md-2865 (LAK), ECF Nos. 330-332; and collectively, the “Motions”).

SKAT filed the Motions on April 27, 2020 and the Court granted them on June 30, 2020. (Memo Endorsements, No. 18-md-2865 (LAK), ECF Nos. 383, 384.) SKAT is now in the process of receiving from the British Virgin Islands and Cayman Islands documents in response to the letters of request that were the subject of the Motions. On March 5, 2021, we were informed that an exhibit filed in support of the Motions contains codes that could be used in conjunction with other information to access information in Companies House, the registry of limited companies in the United Kingdom. In the interest of preventing potential unauthorized access to the Companies House registry, SKAT now requests that this particular exhibit be kept under seal in both Motions in the multi-district litigation and the associated individual cases. The document is filed as Exhibit 10 to the Declaration of Neil J. Oxford in support of the BVI Motion and as Exhibit 11 to the Declaration of Neil J. Oxford in support of the Cayman Motion.

SKAT will be prepared to answer any questions the Court has about this request. We contacted lead counsel for the Defendants to inform them of this request and have received no objections.

Respectfully submitted,

/s/ Neil J. Oxford

Neil J. Oxford

cc: All counsel of record via ECF.